Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Wireless E911 Location Accuracy Requirements	)	PS Docket No. 07-114
	)	

REPLY COMMENTS OF GCI COMMUNICATION CORP.

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SUMMARY

GCI supports the efforts by the Commission and industry to improve location accuracy standards. It is critical, though, that standards both encourage improvements in emergency call location information and take into account the realities of serving low density, remote areas, so as not to discourage much needed deployments to underserved areas when arbitrary standards cannot be met due to technical and economic constraints. The joint AT&T, APCO, and NENA proposal must be adjusted to reach this balance, particularly for Tier III GSM providers.

RCA/T-Mobile propose important such adjustments, which GCI supports. RCA/T-Mobile also accurately identify that even these may not be sufficient for some areas, and this is the case throughout Alaska, where communities are organized not by county, but by borough. Most of Alaska's boroughs cover vast stretches of land, are dotted with communities with sparse population densities, and present difficult network design issues. Applying countywide measures to these land areas does not make sense. Even in those locations where triangulation could potentially be achieved, the cost of doing so would call into question whether the service itself could be provided at all. For the many Alaska communities hoping to receive wireless service for the first time, this is not a step forward in public safety improvement. GCI therefore recommends that Tier III carriers in Alaska be permitted to exclude from measurements any community or area within a community where three cell sites are not viewable from a handset, until such time that the carrier deploys an A-GPS system and achieves an 85 percent handset penetration in the measured area.

Likewise, GCI agrees with RCA/T-Mobile that GSM providers require an additional period of time to implement additional network solutions as they become available. GCI also concurs with the commenters that a waiver grant process is necessary to address those additional

circumstances where topography, tree lines, or other barriers preclude successful triangulation in a given area. Finally, the work of the E911 Technical Advisory Group could be very beneficial in identifying where further adjustments to the interim benchmarks or final standards may be necessary to accommodate the differences in providing service in rural areas.

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GCI Communication Corp. ("GCI") hereby submits these reply comments in response to the comments submitted in the above referenced-proceeding.[1] As stated in the comments submitted by Rural Cellular Association ("RCA") and T-Mobile USA, Inc. ("T-Mobile") (collectively "RCA/T-Mobile"), the proposal submitted by AT&T, the Association of Public-Safety Communications Officials, International ("APCO") and the National Emergency Number Association ("NENA") regarding the provision of Phase II E911 service measured at the county level using network-based technologies, and as supplemented by the AT&T *ex-parte* submitted on September 5, 2008 (the "AT&T Proposal"),[2] does not take into account the technological and economic realities of providing service to low-density, rural locations, especially in Alaska. As a result, strict adherence to the proposed metrics for such areas could have the perverse result of stifling deployments to areas most in need of wireless infrastructure investment.

While GCI generally supports the proposals in the RCA/T-Mobile comments, as RCA/T-Mobile point out, even its proposed revisions might not wholly resolve individual Tier III carrier

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[1] Public Notice, *Comment Sought on Proposals Regarding Service Rules for Wireless Enhanced 911 Phase II Location Accuracy and Reliability*, DA 08-2129, PS Docket No. 07-114, 73 FR 55473-01 (2008).

[2] *See* Comments of T-Mobile USA, Inc. and the Rural Cellular Association on the 911 Location Accuracy Remand, PS Docket No. 07-114, p. 2 (filed Oct. 6, 2008) (hereinafter "RCA/T-Mobile Comments"); *see* Letter from Brian Fontes, CEO, NENA; Robert Gurss, Director, Legal & Gov't Affairs, APCO; and Robert W. Quinn, Jr., SVP – Federal Regulatory, AT&T, to the Hon. Kevin Martin, Chairman, Federal Communications Commission (filed Aug. 25, 2008) ("August 25 Letter"); *Ex Parte*, AT&T Services, Inc., PS Docket No. 07-114, CC Docket No. 94-102 at 1 (filed Sept. 5, 2008) ("AT&T September 2008 Ex-Parte").

issues.[3] This is certainly the case for GCI with respect to its ongoing statewide wireless deployment in Alaska, including many communities where there is *no wireless service today*. Arbitrarily imposing even the revised standards in these areas could disrupt and potentially stop deployment. This would be a huge step backwards for public safety, infrastructure deployment, and extending comparable services throughout rural Alaska, as required by the universal service mandate under Section 254 of the Communications Act.

The primary disconnect between the proposed measures and their application in Alaska, even as adjusted by the RCA/T-Mobile proposals, is that Alaska is not organized by county. The closest analog in Alaska is a borough, a governmental unit into which some, but not all, of the communities in the state are organized. While similar in its function to a county, an Alaskan borough often contains widely dispersed, noncontiguous communities. In terms of wireless service, many of the communities in boroughs require only a single site. Transmissions in between locations are often by satellite. In this situation, rarely will the presence of three or more cell sites in a borough or a community actually mean that there are three viewable sites for a single user anywhere in a given area. Thus, the RCA/T-Mobile viewability standard should be tweaked for Alaska so that it is also applied on a community basis, not just on a county/borough basis.

Even for those Alaskan communities where population densities and terrain call for three or more sites, GCI faces the same limitations as other Tier III providers utilizing GSM technology. Without access to a viable hybrid approach, GCI agrees with RCA/T-Mobile that GSM providers require an additional period of time to implement additional network solutions once they come available. Finally, GCI concurs with those commenters identifying the

[3] RCA/T-Mobile Comments at 22.

continued need for a waiver grant process for the Commission to address those exceptional circumstances where topography, tree lines, or other barriers preclude successful triangulation in a given area, regardless of the number of sites deployed.

I. COUNTY-BASED MEASURES MUST BE ADJUSTED FOR NETWORK-BASED PROVIDERS IN ALASKA UNTIL A VIABLE HYBRID SOLUTION CAN BE DEPLOYED

County-based measures generally are not suitable for Alaska. To the extent that Alaskan communities are organized into a comparable governmental unit, called "boroughs", they often cover a tremendous overall landmass and include communities hundreds of miles apart. While there are exceptions in the more populated areas of the state, the benchmarks simply don't work for a provider serving only Alaska, and to rigidly impose the AT&T-crafted standards threatens to render economically impossible GCI's ability to carry out its plans to deploy wireless services statewide. While AT&T Wireless itself offers services in Alaska's more urban centers, as a national carrier, the percentage targets would never require it to solve the service issues GCI and other Alaska-based wireless providers face. But applying them "as-is" will stifle deployment to communities that today have no wireless services. For these reasons, GCI proposes that: (1) any borough that does not have three sites viewable simultaneously from a handset be excluded, and (2) to the extent such viewability exists within the borough, the measures must be applied only to the areas within a community where it exists and not applied community or borough-wide, with all other areas excluded. Once an A-GPS solution can be deployed and the carrier can achieve 85 percent handset penetration, the exclusions would no longer be necessary.

A. County-Based Standards Are Not Well-Suited to Alaska's Boroughs

As a threshold matter, the notion of "county" is not even squarely applicable in Alaska. Alaska is not divided into county units, but for the most part, into 16 boroughs. The "borough"

system is the closest analog to county (or even parish) in the lower 48, but with some key differences. Alaska boroughs generally share the difficult characteristics cited by AT&T with respect to rural areas: difficult terrain, variations in cell density, and existing network designs.[4] However, unlike elsewhere in the lower 48, these attributes are amplified due to low population densities that are surrounded by vast stretches of remote and inaccessible lands and unique topographical attributes that limit achievable accuracy of Phase II service at the county (or borough) level.

The boroughs typically encompass much greater land mass than counties, have relatively smaller populations, and/or unique topography. Many boroughs are dotted with small, non-contiguous communities, often separated by hundreds of miles of unpopulated land.[5] Many villages have less than a few hundred inhabitants and are reachable only by boat, small aircraft, sled or snow machine. Communications between these communities are often carried via satellite link, such that mobile traffic between communities ride the satellite network and are not transmitted directly via cell sites. This unique network structure helps explain why there is little ability to triangulate among cell sites in Alaska outside of core areas.

Many Alaskan communities have never had wireless service. As part of its statewide wireless deployment and depicted in the attached map, GCI intends to provide wireless services to almost 200 villages, many for the first time.[6] In many cases, the service will be introduced in isolated, thinly populated communities. As a result, rarely will the presence of three or more cell sites in a borough actually mean that there are three viewable sites for a single user anywhere in the borough. The following discussion, providing a snapshot of each borough where a PSAP

[4] *See AT&T September 2008 Ex-Parte*.

[5] *See* Attachment 1, Wireless Availability in Alaska Communities: February 2008.

[6] *Id.*

exists and a Phase II request has been delivered or is expected, illustrates that not only should any Alaska borough with less than three sites be excluded from the proposed measures, as RCA/T-Mobile have proposed for counties, but also that it is necessary to apply the three-site viewability standard on a community basis (not a county or borough basis) for Alaska.

Sitka is a borough covering 2,873 square miles, with 8,805 inhabitants and only 3 people per square mile.[7] Even with the large expanse, no communities exist in the borough outside of the core area of Sitka City. Coverage will be provided to the entire core population using no more than two cell sites, so triangulation will be impossible

The **Kenai Peninsula Borough** covers 16,013 square miles of total area, with 50,980 inhabitants, and only 3.2 persons per square mile.[8] There are 38 communities within the borough; only twelve have more than one thousand inhabitants, and thirteen have less than two hundred.[9] Only a handful of communities in Kenai call for more than two sites for coverage, but even in these cases, the sites themselves will not be commonly viewed by a single handset in the community. For example, in Homer (pop. 5,332) and Seward (pop. 2,540), [10] triangulation is compromised as each is located along hills and has a low population density as many residents live along the highway in a linear corridor. This is similar to the problem of triangulating along the Kenai Peninsula, traced by the Kenai highway. No matter how many sites were deployed, they would essentially be in a straight line, so impossible to triangulate.[11]

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[7] United States Census, Census 2000 Summary File, available at http://factfinder.census.gov/servlet/GCTTable (hereinafter "U.S. Census 2000"); *see also* Alaska Population Overview, 2003-2004 Estimates at 143, available at http://www.labor.state.ak.us/research/pop/popover.pdf (hereinafter "Alaska Population Overview").

[8] U.S. Census 2000; Alaska Population Overview at 131.

[9] *Id.*

[10] *Id.*

[11] *See* Attachment # 2 (depicting a "string of pearls" cell deployment along the highway in the Kenai Peninsula).

The **Fairbanks North Star Borough** covers 7,366 square miles of total area, with 84,979 inhabitants, and only 11.5 and persons per square mile.[12] The most populated community is Fairbanks City with approximately 29,000 inhabitants, with the balance dispersed across eleven communities.[13] Even in the more populated "core" communities of Fairbanks and North Pole, population density is so low that the communities require a larger number of fringe cells to provide coverage. The higher number of fringe cells required to provide service coverage in the area means that although more than three cells may be deployed in the community, those cells will not consistently provide three-site simultaneous handset viewing. Were such cells repositioned purely to achieve higher incidences of triangulation, accuracy and safety in the area would be diminished. Moreover, outside of Fairbanks City, the Fox/Goldstream area (pop. 348), Ester (pop. 1,811), North Pole (pop. 1,532), and Eielson AFB (pop. 4,587) all represent examples where an A-GPS solution would be needed to meet accuracy requirements because the inhabitants are spread out over a relatively large geographic area, often in hilly and treed terrain.[14]

The **Juneau Borough** covers 2,716 square miles of total area, with a population of 30,966 citizens and only 11.4 persons per square mile. [15] Even though Juneau is likely to accommodate three or more sites, significant geographic and topological challenges exist for locating sites. The third largest community in the state is nestled between two high mountain ranges, with an associated terrain making the placement of cell sites throughout the borough sufficient to achieve triangulation for most of the population either physically impossible or

[12] *See* U.S. Census 2000; s*ee also* Alaska Population Overview at 127.

[13] *Id.*

[14] *Id.*

[15] U.S. Census 2000; s*ee also* Alaska Population Overview at 129.

economically prohibitive. The **Matanuska-Susitna Borough** has 24,681 square miles of total area, 70,148 people, and only 2.8 persons per square mile.[16] Of the 28 communities in the borough, seven have more than three thousand inhabitants, nine have between one to three thousand inhabitants, twelve have less than one thousand inhabitants, and more than six thousand do not live within a community area at all.[17] In those few communities where accuracy may be achieved via site installation, such accuracy would be limited to those specific locations. For example, accurate location information may be produced in the core areas of Wasilla (pop. 6,109) and Palmer (pop. 5,197), however, this is a mere one-fifth of the population of the borough.[18] The cell site density, lack of contiguous or border areas, and geometric architecture outside of the core area preclude improving the results without putting the ability to provision of service itself at risk. Similar to the Kenai Borough, Matanuska-Susitna has a long highway that creates a significant "string of pearls" situation, where neighboring sites may be multiple, but arrayed in a line.

Finally, even the most populated **Anchorage Borough** presents challenges. Although Alaska's most populated borough with 277,498 inhabitants, it covers 1,697 square miles with a relatively low population density of 163.5 people per square mile.[19] Even in Anchorage, the population disbursement means that while accuracy measures may be met for some locations, the results are not uniform across the borough. The relatively low density of the borough presents challenges (though not as formidable as in the remainder of the PSAP-served locations) for meeting benchmarks.

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[16] U.S. Census 2000; *see also* Alaska Population Overview at 137.

[17] *Id*.

[18] *Id.*

[19] U.S. Census 2000; *see also* Alaska Population Overview at 120.

B. Tier III Carriers in Alaska Should Be Permitted to Exclude from Measures Those Communities and Areas Within Communities Where Three Cell Sites Are Not Viewable from a Handset

RCA/T-Mobile correctly note that compliance by other carriers with the interim benchmarks is made much more difficult in counties where less than three cell sites are needed to provide service. Simply put, "there is no logical basis for requiring carriers to include counties with only one or two cell sites, for which a carrier will never be able to improve its network-based accuracy."[20] The three cell viewability standard, however, must be applied in Alaska on a community, rather than county (or borough) basis.[21] This is a reasonable approach because as noted above, rarely will the presence of three or more cell sites in a borough or community actually mean that there are three viewable sites for a single user anywhere in the borough or community. Under this standard, Tier III carriers in Alaska would be permitted to exclude from interim and final benchmarks any part of a borough or community where a handset cannot view a minimum of three cell sites that are spaced in a manner that allows for triangulation, so that the carrier need not take test measurements in any part of the community that has only one or two sites that are viewable from a handset. However, a carrier would still be obligated to provide Phase I or, to the extent possible, Phase II service until such a time as a viable A-GPS system can be deployed and an 85 percent penetration in the area to be measured is achieved.

Indeed, this approach is the only way to put Tier III providers in Alaska on the same footing with AT&T in terms of the ability to demonstrate compliance. Although AT&T recognizes that there are areas where it cannot comply with the new accuracy location

[20] RCA/T-Mobile Comments at 20.

[21] *Compare* Comments of Corr Wireless Communications, LLC, PS Docket No. 07-114, at 2 (filed Oct. 6, 2008) ("Corr Comments") (arguing that the MSA is the more useful means of measuring compliance.) However, even the MSA will not work in Alaska, because the state is comprised of two broad MSAs and three micro MSAs, which still do not account for the difficulties in complying on a community-by-community basis.

standards,[22] AT&T, with a national network, can basically exclude the types of areas RCA/T-Mobile and GCI described. The areas that prove challenging for AT&T to comply get swept into the 40 percent excluded from compliance in Year 1 and the 30 percent excluded from compliance in Year 3. For GCI and other Tier III carriers offering wireless service primarily to rural areas, the difficulties in meeting the requirements of the interim benchmarks apply almost to the entirety of the measured service areas and their populations. As a result, the AT&T Proposal actually imposes a more stringent standard on GCI and other Tier III carriers simply for extending wireless services to places in greatest need.

C. Failure to Account for the Significant Differences in Alaska Service Area Characteristics Will Retard Public Safety and Service Advancements for Rural Alaskans

Until a viable hybrid solution is available for Tier III providers like GCI, the only other course to meet location accuracy standards under the AT&T Proposal would be to install a significant number of additional cell sites.[23] If such an undertaking were required across the boroughs and communities described above, the challenges are immediately apparent. In many cases, terrain, line-of-sight barriers, and even property ownership hurdles[24] preclude the necessary siting for effective triangulation.[25] Even where these issues can be resolved, though, the additional cost of deploying service to high cost, low population areas would threaten the already delicate financials for deploying the service in the first place. While GCI presents a

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[22] *See* Comments of AT&T, Inc., PS Docket No. 07-114 at 2 (filed Oct. 6, 2008) (recognizing that there may be areas where AT&T cannot provide accurate location information as a technological matter.)

[23] Comments of the National Telecommunications Cooperative Association, PS Docket No. 07-114 at 3 (filed Oct. 6, 2008).

[24] Approximately 89 percent of Alaska is designated as federal or state lands. In addition, property rights within or around a community may be held by private interests, the community, the borough, or an Alaska Native Regional Corporation, if discernible at all. This has presented ongoing challenges for siting towers and other communications equipment.

[25] *See AT&T September 2008 Ex-Parte; see also* Comments of Motorola, Inc., PS Docket No. 07-114 at 3 (filed Oct. 6, 2008) (recommending that the Commission harmonize the AT&T and Verizon proposals so that carriers have the flexibility for exclusions based on forestation, urban canyons, urban/rural buildouts, and other situations.)

unique opportunity for a transformational statewide wireless and broadband infrastructure investment, the added expense of a mandated network design far exceeding that necessary to provide the service itself could very well sink the effort. Such a result would be passing strange, were a misdesigned accuracy location requirement stall the deployment in the first place, leaving rural Alaskans in their current vulnerable state. In no way would the continued denial of service satisfy the FCC's goal of "ensur[ing] that wireless E911 service meets the needs of public safety and the American people."[26]

Adopting a rational criterion that recognizes the service realities faced by Tier III carriers in Alaska, moreover, does not mean that citizens will be without E911 service or experience a loss in public safety. Carriers will still be required to provide at least Phase I, or Phase II service to the extent technically feasible, until such a time as the location accuracy standards can be applied in a particular community. And at that point, it is likely that advances in technology will ensure even better accuracy result, without the misguided detour along the way of adding sites, not to improve service, but to "make" a measurement.[27] Failure to tailor the location accuracy mandate appropriately could deliver a serious blow to the deployment of much-needed wireless infrastructure throughout Alaska. However, by implementing this additional adjustment in the applicability of the interim benchmarks in truly challenging locations, the FCC will pave the way for superior results.[28]

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[26] *Wireless E911 Location Accuracy Requirements; Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Association of Public-Safety Communications Officials-International, Inc. Request for Declaratory Ruling; 911 Requirements of IP-Enabled Service Providers,* Notice of Proposed Rulemaking, 22 F.C.C. Rcd 10609 (¶ 1) (rel. June 1, 2007); s*ee* Comments of the National Telecommunications Cooperative Association, PS Docket No. 07-114 at 3 (filed Oct. 6, 2008); *see also* Comments of Blooston Rural Carriers, PS Docket No. 07-114 at 3 (filed Oct. 6, 2008).

[27] *See* Comments of S5 Wireless, Inc. at 1.

[28] *See id.* at 1-2 (asserting that hybrid location technology and services when used with GPS demonstrates significant accuracy improvements.)*; compare* Comments of Motorola at 3 (arguing that GSM-based carriers not be subject to interim benchmarks.)

II. EVEN WITH THE ALASKA-APPROPRIATE ADJUSTMENTS, ADOPTION OF THE RCA/T-MOBILE INTERIM BENCHMARK TIMEFRAMES IS CRITICAL

AT&T in its comments acknowledges that the measurements and benchmarks it proposes are "aggressive" and cannot be met relying solely on a network-based E911 solution.[29] The AT&T Proposal's interim benchmarks for GSM providers are apparently only viable for the nation's largest wireless providers, including AT&T, which is further along than any other GSM-based carrier in deploying A-GPS handsets.[30] AT&T was able to launch its 3G services as early as 2004 in some markets on spectrum that it already had in its inventory and which was fully cleared.[31] This lead in deploying 3G services meant that, when AT&T launched A-GPS-capable 3G handsets ahead of the rest of the GSM carriers, it was able immediately to begin to shift substantial numbers of subscribers to these handsets.[32]

In contrast, the rural-based carriers clearly demonstrate that no viable technology exists today for a GSM-based carrier to meet the AT&T Proposal's requirements.[33] GCI itself can attest that there are no A-GPS capable 2G handsets available to *any* GSM carrier, as deployment of A-GPS-capable handsets is tied directly to deployment of 3G services.[34] GCI has researched the issue extensively in preparing for its statewide wireless deployment and has found that even the handsets that are available are not viable options. For example, many handsets released between 2004 and 2006 have reached the end of their life and are no longer in production. The

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[29] Comments of AT&T, Inc. at 3 (citing to August 25 Letter.)

[30] *See* RCA/T-Mobile Comments at 11 ("There is no basis for concluding that GSM carriers, other than AT&T, can meet AT&T's benchmarks.")

[31] *See* Comments of RCA/T-Mobile at 13.

[32] *Id.* at 14.

[33] *See* Comments of Rural Telecommunications Group, Inc., PS Docket No. 07-114 at 2 (filed Oct. 6, 2008); *see also* Comments of National Telecommunications Cooperative Association at 2; *see also* RCA/T-Mobile comments at 13.

[34] *Ex-Parte Handout* - T-Mobile, T-Mobile Hybrid Location Meeting with OET, PS Docket No. 07-114, WC Docket No. 05-196, slide 13 (filed Aug. 27, 2008) ("T-Mobile Presentation").

handsets that currently are in production are expensive and would require a small carrier to absorb a significant expense in making them attractive to customers by discounting their cost. And once a greater, more cost-effective selection is available, they can reasonably be expected to go to the larger carriers first. Just by way of comparison, T-Mobile, which itself is waiting for these handset options, is an established nationwide[35] provider serving more than 30 million customers, [36] while GCI is in the process of deploying service only in Alaska, with a population of six hundred and fifty five thousand.[37]

Even when the handsets become available, it also will take additional time to acquire and distribute the handsets in sufficient quantities and varieties to allow a Tier III carrier to meet its customers' needs. Given the varied preferences and circumstances among customers, providers have to offer a mix of handset options at a range of price points. Moreover, meeting the AT&T Proposal's benchmarks would require a carrier to change "most or all handsets, requiring substantial transition time." [38] Although distribution appears easy on paper, it is plain from experience that changing subscriber handsets present significant challenges,[39] such that even with diligent efforts, it takes a substantial amount of time to get replacement handsets into the subscribers' hands in any significant numbers.

In addition to the lack of handset availability, each network must be configured to process the A-GPS information. As RCA/T-Mobile note in their comments, the deployment of A-GPS-capable handsets is tied directly to the deployment of 3G services. However, as noted by

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[35] *See* T-Mobile coverage map, available at http://www.t-mobile.com/coverage/pcc.aspx.

[36] *See Press Release:* T-Mobile Breaks 30 Million Customer Mile Stone and Reports First Quarter 2008 Results. May 8, 2008, available at http://www.t-mobile.com/Company/InvestorRelations.

[37] Alaska Population Overview at 11.

[38] T-Mobile presentation at slide 2.

[39] *See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems: E911 Phase II Compliance Deadlines for Tier III Carriers*, Order, 20 F.C.C. Rcd. 7709 (2005).

RCA/T-Mobile, AT&T is the only GSM-based carrier that has deployed a 3G network.[40] Any consideration of the AT&T Proposal must therefore take into account the additional time all the other carriers, especially Tier III carriers, need to fund and deploy the correct network infrastructure. While GCI understands that a hybrid approach utilizing A-GPS currently is most likely to be the means by which GSM-based carriers will measure Phase II accuracy at the county level, because of the geographic area, the lack of technological availability and logistical issues associated with its deployment, the interim benchmarks proposed in the AT&T Proposal are not feasible. Instead, the Commission should adopt the RCA/T-Mobile proposal to extend the timing for implementing the interim benchmarks for Tier III carriers at least one year for the first benchmark and two years for the others.[41]

III. A WAIVER PROCESS PLUS INDUSTRY GROUP COLLABORATION WILL BE NECESSARY TO ADDRESS EXCEPTIONAL ISSUES FOR TIER III PROVIDERS

Given the many unique attributes of providing Phase II service in Alaska, GCI wholly supports the RCA/T-Mobile proposal of allowing carriers to seek waivers of location accuracy measures or benchmarks on a case-by-case basis. This approach is in line with the Congressional mandate in the ENHANCE 911 Act, which requires the Commission to grant a Tier III carrier a waiver if strict enforcement would result in consumers having decreased access to emergency services.[42] As RCA/T-Mobile aptly states, "[i]t is impossible to address in a single sweep the entire range of different circumstances that will face carriers in rural areas –

[40] RCA/T-Mobile Comments at 11.

[41] *Id.* at 6.

[42] National Telecommunications and Information Administration Organization Act -- Amendment, Pub. L. No. 108-494, 118 Stat. 3986 (2004). *See also* Comments of National Telecommunications Cooperative Association at 3.

who may have few or no dense areas to factor into their benchmark determinations and who may serve only a small number of counties."[43] This holds true in communities throughout Alaska. GCI generally supports calls for the establishment of a well-organized E911 technical advisory group to offer solutions to providing more accurate E911 location information.[44] The reports described in AT&T's comments will help the Commission understand problems in providing services in rural areas with low population densities and diverse and difficult terrain.[45] The Commission should also utilize the report to identify where further adjustments to the interim benchmarks or final standards may be necessary to accommodate the differences in providing service in rural areas.

IV. CONCLUSION

GCI agrees with many commenters serving rural locations that the AT&T Proposal does not take into consideration the many issues faced by Tier III carriers providing service in areas with difficult terrain and low population densities. The proposals set forth in the RCA/T-Mobile comments are important progress toward a more rational application of interim benchmarks to Tier III carriers, but a further exception must be made to account for the unique nature of providing service throughout the boroughs in Alaska. Accordingly, Tier III carriers in Alaska must be permitted to exclude from measurements those communities and areas within a community where three cell sites are not viewable from a handset, until such time that an A-GPS system has been deployed and an 85 percent handset penetration in the measured area is achieved.

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[43] RCA/T-Mobile Comments at 22.

[44] *See* Comments of AT&T, Inc. at 4-5.

[45] *Id.*

In addition, because of the lack of an A-GPS solution for GSM carriers, GCI supports the RCA/T-Mobile proposal to extend the deadlines to meet the interim benchmarks by at least one year for the first benchmark and two years for the others. Finally, the Commission should establish a waiver grant process to address those additional circumstances where topography, tree lines, or other barriers preclude successful triangulation in a given area.

Respectfully submitted,

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_/s/___

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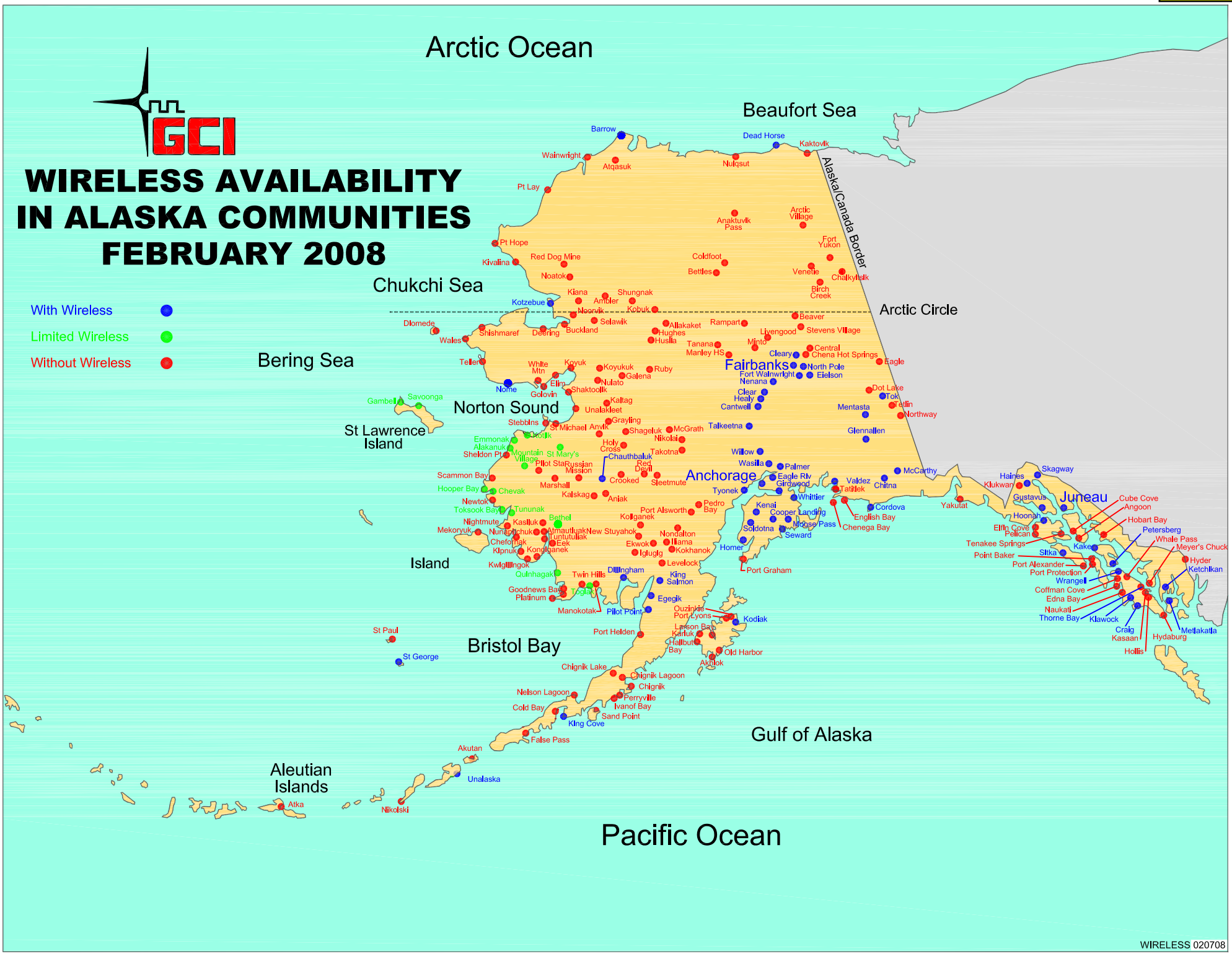
Attachment 1



ATTACHMENT 2